

**From:** "Hufschmid, Joy" <Jhufsch@co.santa-barbara.ca.us>  
**To:** "'centralcoast@waterboards.ca.gov'" <centralcoast@waterboards.ca.gov>  
**Date:** 5/26/2009 4:15 PM  
**Subject:** Basin Plan Triennial Review  
**Attachments:** Bacteria TMDL Amendment Comment Form.pdf

Comment form is attached. Thank you.

Joy Hufschmid  
Project Clean Water Manager  
Santa Barbara County Public Works Department  
(805) 568-3373

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD****Central Coast Region**

895 Aerovista Place, Suite 101  
San Luis Obispo, CA 93401



## **2009 BASIN PLAN TRIENNIAL REVIEW COMMENT SUBMITTAL FORM**

Please use this form to submit comments that you would like the Central Coast Regional Water Quality Control Board to consider during the Triennial Review of the Water Quality Control Plan for the Central Coastal Basin (Basin Plan). Comments submitted through the Triennial Review process provide the public with an opportunity to assist the Central Coast Regional Water Quality Control Board in identifying issues that need to be addressed through Basin Plan amendments in order to best meet the water quality planning needs of the Region.

The Central Coast Regional Water Quality Control Board is moving in a fundamentally new strategic direction, based upon a Vision of Healthy Functioning Watersheds. This new Vision represents a refocusing of our approach – a new framework for how we conduct business and achieve measurable results. The Vision structures our work towards our highest water quality priorities and more strategically aligns us with the anticipated challenges and opportunities in water quality and positions our agency to respond more nimbly to unexpected ones. For additional information about the Regional Board's Vision process, please see the following website: [http://www.waterboards.ca.gov/centralcoast/publications\\_forms/publications/vision/index.shtml](http://www.waterboards.ca.gov/centralcoast/publications_forms/publications/vision/index.shtml)

Comments about any aspect of the Basin Plan are welcome. Of particular interest are comments about water quality standards (e.g., beneficial uses and water quality objectives) and comments that relate or align with the Regional Board's Vision.

Please email completed form(s) to [centralcoast@waterboards.ca.gov](mailto:centralcoast@waterboards.ca.gov). Please include the words "Basin Plan Triennial Review" in the subject line of your communication. Hardcopy forms may be mailed to the address in the header of this form, sent to the attention of Steven Saiz. Fax completed forms to (805) 543-0397. If you have multiple comments (i.e., multiple issues, concerns, suggestions), please submit a separate comment submittal form for each.

Deadline for submittal is Tuesday, **May 26, 2009 at 5:00 p.m.** Thank you for your participation!

**1. CONTACT INFORMATION:**

First Name:	Joy
Last Name:	Hufschmid
Organization Name:	County of Santa Barbara
Address:	123 E. Anapamu Street
City:	Santa Barbara
County:	Santa Barbara
State:	CA
Zip:	93101
Telephone:	(805) 568-3373
Email:	jhufsch@cosbpw.net

**2. DATE of COMMENT:**

May 26, 2009

**3. COMMENT:**

**a. Please specify the topic of your comment.** *(Please try to limit topic to ten words or less.)*

Bacteria TMDL Basin Plan Amendment

**b. Please provide a detailed description of your issue/concern/suggestion, and explain why it needs to be addressed.** *(There is no limit to the amount of text for the comment. The space will expand as needed.)*

As part of the Triennial Review, the County of Santa Barbara requests that the Board consider the development of a Basin Plan Amendment outlining a rationale, contemporary approach to Bacteria TMDLs, including TMDLs for beaches. The County supports a Basin Plan Amendment, as outlined in more detail in a separate comment letter from the City of Santa Barbara, in advance of any additional effort toward the Santa Barbara Beaches Bacteria TMDL process.

The current Bacteria TMDL approach uses standard indicators (fecal indicator bacteria) to assess water quality and develop implementation plans. The result of taking an approach using indicator bacteria concentrations exclusively is that implementation plans will focus on reducing indicator bacteria numbers first and foremost, rather than reducing the risk to human health.

The indicator bacteria method has been retained because it is cheap, easy to perform, and there has been nothing better available. However, after decades of little progress in addressing beach water quality nationwide, recent innovations and scientific advances have occurred and the promise of routine use of indicators to correctly identify risks to human health is imminent. The County urges the Board to take into consideration the rapid advancement of science in this field and postpone the Beaches TMDL until the epidemiology studies, indicator development, and new criteria have been released.

The County recommends that the Basin Plan Amendment contain the following sections, as outlined by the City of Santa Barbara and drawing heavily from the San Diego Basin Plan Amendment:

1. Updated REC-1 objectives, following the San Diego Basin Plan Amendment.
2. A recommendation for immediate reconsideration of the REC-1 objectives upon the USEPA's release of new criteria in 2012.
3. A statement confirming that the driving motive is to protect human health during recreational contact.
4. Prioritization of reducing indicators/sources based on their likely impact on human health as follows:
  - a) Human waste/sewage
  - b) Domesticated animal waste
  - c) Wild animal waste
5. A statement confirming that reduction of indicators that do not relate to human health risk, e.g., indicator bacteria growing in the environment, is not a goal of the TMDL.

6. Approved approaches to the TMDL, including a reference beach approach and a natural exclusion approach.

#### 4. GEOGRAPHIC SCOPE OF COMMENT:

Mark the box ( ) that best corresponds to the geographic scope of your comment:

<input checked="" type="checkbox"/>	Entire Central Coast Region
<input type="checkbox"/>	Multiple watersheds <i>If the watersheds and/or waterbodies are known, please specify here:</i>
<input type="checkbox"/>	Single watershed
<input type="checkbox"/>	Multiple waterbodies
<input type="checkbox"/>	Single waterbody
<input type="checkbox"/>	Beach or coastal waters
<input type="checkbox"/>	Other:
<input type="checkbox"/>	None of the above (comment is administrative or has no direct geographic scope)

#### 5. ADDITIONAL INFORMATION ABOUT YOUR COMMENT:

Information about the following items may help us better understand and evaluate your comment. For any that are applicable to your comment, please elaborate in the space provided. Leave blank if item is not applicable or if you are unsure.

- a. If you think a Basin Plan amendment addressing your comment would likely have widespread stakeholder support, please explain in the space below and, if known, list supportive stakeholder(s) with phone or email contact(s). *(The space will expand as needed.)*

--

- b. If substantial resources have been invested in developing technical information that would support a Basin Plan amendment addressing your comment, please explain in the space below. *(The space will expand as needed.)*

The City of Santa Barbara has spent over \$350,000 in developing and testing DNA-based microbial source tracking tools to correctly identify types and locations of sources of waste to drains, creeks, and beaches. In addition, the City has received over \$400,000 in grant funding from the State Water Board's Clean Beaches Program to continue developing and testing these tools. Finally, the substantial resources are being spent by other agencies and researchers in efforts to improve testing methods, source tracking, and TMDL processes.

- c. If substantial resources are likely available to augment Regional Board resources needed to develop a Basin Plan amendment addressing your comment, please explain in the space below. *(The space will expand as needed.)*

The San Diego Basin Plan can serve as a template for beginning the process, saving substantial staff effort in developing an amendment for the Central Coast.

#### 6. HOW TO BRING ADDITIONAL INFORMATION TO OUR ATTENTION:

- a. If you would like to direct us to additional information that supports/supplements your comment, e.g., web address, report citation, contact person for follow-up, please give direction in the space below. *(The space will expand as needed.)*

- b. If you are submitting additional information that supports/supplements your comment, e.g., reports, articles, data sets, please tell us what you are sending so that once received we can link it to your comment. *(The space will expand as needed.)*

Note: Supporting information may be emailed to [centralcoast@waterboards.ca.gov](mailto:centralcoast@waterboards.ca.gov); sent to the attention of Steven Saiz at the address in the header of this form; or faxed to (805) 543-0397. Please include the words "Triennial Review" in the subject line of your communication.

Our email system can accommodate files up to approximately 15MB. If you are uncertain of how best to submit additional supporting information, please call 805-549-3879.

***Thank you for participating in the Triennial Review of the Basin Plan!***

For additional information about the Triennial Review process, please see the following website:  
[http://www.waterboards.ca.gov/centralcoast/publications\\_forms/publications/basin\\_plan/triennial\\_review/index.shtml](http://www.waterboards.ca.gov/centralcoast/publications_forms/publications/basin_plan/triennial_review/index.shtml)  
!